

REPORT OF REQUEST FOR RESTRICTIVE TRADE PRACTICE OR BOYCOTT  
SINGLE TRANSACTION

(For reporting requests described in Part 769 of the Export Administration Regulations)

## NOTICE OF RIGHT TO PROTECT CERTAIN INFORMATION FROM DISCLOSURE

The Export Administration Act permits you to protect from public disclosure information regarding the quantity, description, and value of commodities or technical data supplied in Item 11 of this report and in any accompanying documents. If you do not claim this protection, all of the information in your report and in accompanying documents will be made available for public inspection and copying.

You can obtain this protection by certifying, in Item 10 of the report, that disclosure of the information referred to above would place a United States company or individual involved in the report at a competitive disadvantage. If you make such a certification in Item 10, you may remove information regarding the quantity, description, and value of the commodities or technical data supplied by you from Item 11 of the inspection copy of the report form and from the public inspection copies of the accompanying documents.

The withholding of this information will be honored by the Department unless the Secretary determines that disclosure of the information would not place a United States company or individual at a competitive disadvantage or that it would be contrary to the national interest to withhold the information.

A		BATCH 1		5	
MONTH/YEAR		6		9	
RSN		10		15	
RTP		18		27	
CLASS		28		55	
FILING		70		80	
SUBSET		16		17	

This report required by law (50 U.S.C. App. §2407 (b) (2) P.L. 96-72; E.O. 12214; 15 C.F.R. Part (769). Failure to report can result both in criminal penalties, including fines or imprisonment, and administrative sanctions.

Instructions: 1. Complete all items that apply. 2. Assemble original report form and accompanying documents as a unit, and submit intact and unaltered. 3. Assemble and submit the duplicate copy of report form (marked Duplicate (Public Inspection Copy)) and additional copies of accompanying documents (marked with the legend "Public Inspection Copy.") 4. If you certify, in Item 10, that the disclosure of the information specified there would cause competitive disadvantage, edit the "Public Inspection Copy" of the documents submitted to exclude the specified information and remove the bottom of the Duplicate "Public Inspection Copy" of the report form relating to Item 11.

Public reporting for this collection of information is estimated to average one hour per request, including the time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. Send comments regarding this burden estimate or any other aspect of this collection of information, including suggestions for reducing this burden, to Office of Security and Management Support, Bureau of Export Administration, U.S. Department of Commerce, Washington, D.C. 20230; and to the Office of Management and Budget, Paperwork Reduction Project (0694-0012), Washington, D.C. 20503

## 1a. Identify firm submitting this report:

Name: **Hubbell Incorporated**  
Address: **584 Derby Milford Road**  
City, State and ZIP: **Orange, CT 06477-4024**  
Country (if other than USA):  
Telephone: **(203) 799-4100**  
Firm Identification No. (if known):

## Specify firm type:

- ☒ Exporter  
☐ Bank  
☐ Forwarder  
☐ Carrier  
☐ Insurer  
☐ Other

## 1b. Check any applicable box:

- ☐ Revision of a previous report (attach two copies of the previously submitted report)  
☐ Resubmission of a deficient report returned by BXA (attach form letter that was returned with deficient report)  
☐ Report on behalf of the person identified in Item 2  
☒ Dual report on behalf of self and the person identified in Item 2

## 2. If you are authorized to report and are reporting on behalf of another U.S. person, identify that person (e.g., domestic subsidiary, controlled Foreign subsidiary, exporter, beneficiary):

Name: **The Ohio Brass Company**  
Address: **8711 Wadsworth Road**  
City, State and ZIP: **Wadsworth, OH 44281-0901**  
Country (if other than USA):  
Type of firm: (see list in Item 1a) **Exporter**  
Firm Identification No. (if known):

## 3. Identify exporting firm, unless same as Item 1a or 2:

Name:  
Address:  
City, State and ZIP:  
Country (if other than USA):  
Firm Identification No. (if known):

## 4. (a) Name of boycotting country from which request originated:

**Saudi Arabia**

(b) Name of country directing inclusion of request, if different from (a) above: **Saudi Arabia**

## 5. Name of country or countries against which request is directed:

**Israel**

## 6. Reporting firm's reference number (e.g., letter of credit, customer order, invoice):

**9811491-003**

## 7. Date firm received request: (use digits for month/day/year)

**10/23/98**

## 8. Specify type(s) of document conveying the request:

- ☐ Request to carrier for blacklist certificate (submit two copies of blacklist certificate or transcript of request)  
☐ Unwritten, not otherwise provided for (make transcript of request and submit copies)

- ☐ Letter of credit  
☐ Requisition/purchase order/accepted contract/shipping instruction  
☒ Bid invitation/tender/proposal/trade opportunity  
☐ Questionnaire (not related to a particular dollar value transaction)  
☐ Other written (specify)

Submit two copies of each document or relevant page in which the request appears

9. Decision on request: (Check one) **See attached explanation**

- ☒ Have not taken and will not take the action requested.  
☐ Have taken or will take the action requested.  
☐ Have taken or will take the action requested and claim it is subject to a grace period (attached detailed explanation).

- ☐ Have taken or will take the action requested but in a modified form (attach detailed explanation).  
☐ Unable to report ultimate decision on the request at this time and will inform the Bureau of Export Administration of the decision within ten days after decision is made.

Additional Information: The firm submitting this report may, if it so desires, state on a separate sheet any additional information relating to the request reported or the response to that request. This statement will constitute a part of the report and will be made available for public inspection and copying, subject to the right to protect certain confidential information from disclosure described in Item 10.

## 10. Protection of Certain Information from Disclosure: (Check appropriate boxes and sign below)

1. ☒ I (We) certify that disclosure to the public of the information regarding quantity, description, and value of the commodities or technical data contained in:  
☒ Item 11 below (If you check this box, be sure to remove the bottom of the Duplicate (Public Inspection Copy) of the report form relating to Item 11.)  
☒ Attached documents (If you check this box, be sure to edit the "Public Inspection Copy" of the documents submitted to exclude the specified information.) would place a United States person involved at a competitive disadvantage, and I (We) request that it be kept confidential.  
2. ☐ I (we) authorize public release of all information contained in the report and in any attached documents. I (We) certify that all statements and information contained in this report are true and correct to the best of my (our) knowledge and belief.

Sign here in ink

**Richard W. Davies, V.P.**

Type or print

**Richard W. DAVIES**

Date

**01/20/99**

**Additional information for Item 9  
of Form BXA-621P submitted by Hubbell Incorporated**

**Item 9      Decision on request**

On or about October 23, 1998, the Ohio Brass Company ("Ohio Brass"), a subsidiary of Hubbell Incorporated, received from the Arabian Electrical Transmission Line Construction Company ("Arabian Electrical"), a company in Dammam, Saudi Arabia, an invitation to quote on certain products. Arabian Electrical indicated an intention to bid on a power transmission project in the Gulf Area.

Paragraph 20 of the invitation included the following instructions:

The following regulations concerning the boycott of Israel for goods imported into the Kingdom of Saudi Arabia should be observed.

Every delivery of good shall be accompanied by:

- a) A certificate of origin countersigned by the Chamber of Commerce in the country of origin.
- b) A manufacturer's certificate stating that their goods do not include any materials manufactured or made in Israel.

Exhibit 1 is a copy of the relevant pages of the invitation.

In response to the invitation, Ohio Power submitted a bid on or about November 4, 1998. The bid contained the following language:

U.S. law imposes restrictions on our ability to respond to requests and abide by conditions related to the Arab boycott of Israel. We are, therefore, unable to comply with the manufacturer's certificate stating that goods do not include any materials manufactured or made in Israel.

Exhibit 2 is a copy of the bid submitted by Ohio Power.

Arabian Electrical Transmission Line  
Construction Co. Ltd.

C.R. 2050034036 - Dammam



الشركة العربية لإنشاء التمديدات  
الكهربائية المحدودة  
سجل تجاري ٢٠٥٠٠٣٦٠٣٦ - الدمام

Ref. No: 1101/ • 5

September 24, 1998.

HUBELL POWER SYSTEMS  
8 Plantagent Park,  
Warfield, Bracknell  
RG 42 7UU, BERKS. UK

Attention: Mr. Mo Garcia, Regional Manager ME & Africa.

Subject: Construction of 380 kV Overhead Line  
Between Riaydh & Qassim (S/S 9009 & 9010)  
Bid No. 507/19/3 - Tender due on 2-11-1998

Dear Sir,

Saudi Consolidated Electric Company Central Region (SCECO-C) has issued tender for above line (388 KM) on Turnkey basis to the prequalified bidders. The project is being financed by electricity charges fund of SAMA. We are participating in above job as main bidder.

This enquiry is being referred to you for the supply of the following material as per Bill of quantities and specifications enclosed.

	<u>MAIN</u>	<u>SPARE</u>
-380 KV Outdoor Surge Arrester to SCECO-C Spec-14/9, complete with surge counter, including steel support structure, fitting and hardware for quad phase conductor connections, etc	12 Nos	3 Nos.

You are requested to prepare your CIF prices with price breakup on the following basis:

1. Prices

- Firm F.O.B. port of shipment prices for all material and equipment in Saudi Riyals only. Packed and F.O.B delivered in accordance with the international and commercial regulations for 1980 issued by the International Chamber of Commerce in Paris/France.
- Marine Freight charges from port of shipment to port of Dammam/Jeddah. The price of marine transportation shall be based for shipment through the following shipping companies.

هاتف : ٨٥٧-٤٠٥٠ - فاكس : ٨٥٩-٤٦٣٠ / ٨٥٧-١٥٩٢ - ص.ب ١٧٢ الدمام ٢١٤١١ - المملكة العربية السعودية  
شركة مشتركة بين شركة التميمي و أي سي سي - شركة ذات مسئولية محدودة مختلطة  
Tel.: 857-4050 - Fax : 859-4630 / 857-1592 - P.O. Box 172 - Dammam 31411 - Saudi Arabia  
A Tamimi Company & ICC (Pvt.) Ltd. Joint Venture Company - Limited Liability Co.

You shall attach with your offer a letter addressed to SCECO-Central Region confirming its compliance with the requirements of Article No. 15 (Attached herewith) inclusive of all clauses.



15. **Liquidated Damages:**

If the supply of material is delayed beyond the scheduled period you shall have to compensate us prior to the final payment for this contract, 1% of the total value of each delayed part for each week delay and the part of the week to be calculated pro rata the days of delay.

The maximum liquidated damages will be 10% of the total order value.

16. **Bid Bond**

If your proposal is technically/commercially sound for incorporation in our bid, we would be requesting you for a Bid Bond being two percent of maximum firm bid price. Bond should be valid for not less than 150 days from Tender opening date i.e. 2.11.98.

17. **Governing Language:**

The official language of correspondence shall be English. Technical information, operation instructions, manuals, drawings, standards and tests shall be in English only.

Marks on equipment and plates to be clearly shown in English and Arabic. All shipping marks, addresses and instructions on all boxes to be in Arabic and English in large letters. You shall have to replace any materials bearing signs in a language other than English (without any additional cost to us).

18. **Metric System:**

For all purposes including filling in Technical Specification data sheets for the proposal, you will follow the metric Unit System (Kg.M-Sec).

19. **Consultants (Engineer):**

For this project Engineer will be Deputy General Manager for Engineering affairs and projects at Saudi Consolidated Electric company in Central region or any or all of his authorized representative.

20. **Boycott of Israel**

The following regulations concerning the boycott of Israel for goods imported into the Kingdom of Saudi Arabia should be observed.

N/A

10. 50%

Kingdom of Saudi Arabia should be observed.

Every delivery of good shall be accompanied by.

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- a) A certificate of origin countersigned by the Chamber of Commerce in the country of origin.
- b) A manufacturer's certificate stating that their goods do not include any materials manufactured or made in Israel
- c) In addition to items a) and b) above, manufacturers in the Federal Republic of Germany shall state in their certificate that their products are not included in German compensations to Israel.

These certificates shall be countersigned by the nearest Kingdom of Saudi Arabia Embassy. In countries where the Kingdom of Saudi Arabia have no diplomatic representation, the countersignature by the Kuwait Embassy or by any other Arabian Embassy will be accepted.

Firms and companies which are on the Black List published by the Israel Boycott Office shall not be permitted to supply goods to the Kingdom of Saudi Arabia.

Ships which are on the Black List published by the Israel Boycott Office shall not be used to ship goods into the Kingdom of Saudi Arabia

21. Symmetrical Short Circuit Current.

The three phase symmetrical short circuit current for conductors shall be 50 KA rms for this project.

Please acknowledge receipt of this letter and confirm that you will be favouring us with an offer. In case of any queries, please do not hesitate to get in touch with us.

Thanking you, we remain

Yours truly,  
For AETCON.

Pervaiz S. Siddiqi,  
Director.

Encls: As above.



210 North Allen Street  
Centralia, Missouri 65240  
Tel: FAX: 573-682-8516

Quotation Number: 9811491-004

Customer Ref: 507/19/3

DIRECTOR OF PURCHASING  
ARABIAN ELECTRICAL  
TRANSMISSION LINE CONSTRUCTION  
P.O. BOX 172  
DAMMAM EX 31411 SAUDI ARABIA

Expiration Date: 3/10/99

Inquiry Date: 10/23/98

Terr: 9800

WE ARE PLEASED TO FURNISH THIS OFFER, SUBJECT TO THE TERMS AND CONDITIONS OF SALE SHOWN ON THE REVERSE SIDE  
HEREOF, WHICH ARE BINDING UPON THE PARTIES HERETO.

Item	Quantity	Catalog Number	Unit Price	Extended
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15 Cat#: SIMILAR TO VH4 #217888  
PORCELAIN HOUSED METAL-OXIDE DESIGN IEC CLASS-4 HEAVY DUTY  
STATION ARRESTERS, 360KV RATED, 288KV MCOV, 12000 MM CREEPAGE  
DISTANCE, BROWN GLAZE, SIMILAR TO #217888 BUT ASSEMBLED IN A  
LARGER HOUSING FOR 12000 MM CREEPAGE DISTANCE, PER IEC 99-4.

Drawing Attached

Net: .000 Lbs Packed: 0 Lbs Volume: 0 CuFt

Lead Time 36 WEEKS

15 Cat#: 272145-3076  
INSULATING SUB-BASE FOR VH4 TYPE ARRESTERS

Drawing Attached

Net: .000 Lbs Packed: 0 Lbs Volume: 0 CuFt

Lead Time 36 WEEKS

15 Cat#: 24-5121  
DISCHARGE COUNTER WITH LEAKAGE CURRENT METER.

Drawing Attached

Net: .000 Lbs Packed: 0 Lbs Volume: 0 CuFt

QUOTED PRICES INCLUDE O-B WARRANTIES,  
EXPORT PACKING, STANDARD ROUTINE TESTS  
PER CLAUSE #8.1 OF IEC 99-4, PLUS A COPY  
OF CERTIFIED TYPE TEST REPORTS PER IEC  
SIGNED BY A PROFESSIONAL ENGINEER.

KINDLY REFER TO ATTACHED O-B DRAWINGS  
AND O-B CATALOG 86A FOR TECH DETAILS.  
A NEW ARRESTER DRAWING WILL BE PREPARED  
AFTER RECEIVING YOUR ORDER FOR FINAL  
APPROVAL BEFORE ENTERING INTO OUR SYSTEM

THE LEAD TIME GIVEN IS FOR BROWN GLAZE  
HOUSING. THIS WILL BE MUCH SHORTER IF  
GREY GLAZE HOUSINGS ARE ACCEPTABLE.

TERMS: IRREVOCABLE LETTER OF CREDIT  
CONFIRMED BY A PRIME USA BANK. 100% PAYABLE  
AT SIGHT AGAINST SHIPPING DOCUMENTS.

Copy 1



Date Issued: 11/04/98 Page 2

210 North Allen Street  
Centralia, Missouri 65240  
Tel: FAX: 573-682-8516

Quotation Number: 9811491-003  
Customer Ref: 507/19/3

DIRECTOR OF PURCHASING  
ARABIAN ELECTRICAL  
TRANSMISSION LINE CONSTRUCTION  
P.O. BOX 172  
DAMMAM EX 31411 SAUDI ARABIA

Expiration Date: 3/10/99  
Inquiry Date: 10/23/98  
Terr: 9800

WE ARE PLEASED TO FURNISH THIS OFFER, SUBJECT TO THE TERMS AND CONDITIONS OF SALE SHOWN ON THE REVERSE SIDE  
HEREOF, WHICH ARE BINDING UPON THE PARTIES HERETO.

Item	Quantity	Catalog Number	Unit Price	Extended
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Lead Time 36 WEEKS

Payment: LETTER OF CREDIT (IRREVOCABLE)  
Freight: YELLOW FREIGHT  
Ship Via: FOB ORIGIN F/A\$2000+

Lead time quoted starts after receipt of order &  
Acceptable letter of credit

Ocean Freight...	3,148.00
Insurance.....	272.39

Total of quote:  
CIF DAMMAM, SAUDI ARABIA

INSURANCE WILL BE AS PER OUR STANDARD INSURANCE POLICY.

MARKS ON EQUIPMENT AND PLATES WILL BE ENGLISH LANGUAGE.

THE FREIGHT CHARGES QUOTED ARE BASED ON SHIPMENT USING OHIO BRASS'S  
DESIGNATED FORWARDER/CARRIER. SHOULD YOU DESIGNATE A FORWARDER OR  
CARRIER THE FREIGHT CHARGES WOULD BE SUBJECT TO RENEGOTIATION.

"U.S. LAW IMPOSES RESTRICTIONS ON OUR ABILITY TO RESPOND TO REQUESTS AND  
ABIDE BY CONDITIONS RELATED TO THE ARAB BOYCOTT OF ISRAEL. WE ARE, THEREFORE,  
UNABLE TO COMPLY WITH THE MANUFACTURER'S CERTIFICATE STATING THAT GOODS DO  
NOT INCLUDE ANY MATERIALS MANUFACTURED OR MADE IN ISRAEL."

WE TAKE EXCEPTION TO ARTICLE 15. WE ARE A MANUFACTURER AND NOT A CONTRACTOR.

Quotation By

*Velva Frazier*  
Velva Frazier  
Customer Service Rep.

Copy 1